IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
LASALLE COUNTY, OTTAWA, ILLINOIS

FILED
JUN 26 2015
LASALLE COUNTY CIRCUIT CLERK
THIRTEENTH JUDICIAL CIRCUIT OF ILLINOIS

KEVIN R. KRAMER	)	
Petitioner,	)	
vs.	)	No. 15-F-153
	)	
JULIA C. EICKMEIER,	)	
Respondent.	)	

PETITION FOR MODIFICATION FOR CHILD CUSTODY

NOW COMES the Petitioner, KEVIN R. KRAMER, by his attorneys, Aplington, Kaufman, McClintock, Steele & Barry, Ltd., Robert B. Steele of counsel, and for his Petition for Modification for Child Custody states as follows:

1. That a Joint Parenting Order was entered on April 24, 2014 in Bureau County, Illinois which provided in part as follows:
    a. The parties are named as joint custodian of the minor child and that joint custody of the minor child of the parties, namely Madeline, is awarded to the parties, Petitioner, Kevin Roy Kramer, and the Respondent, Julia C. Eickmeier. Each parent shall be designated the "Custodial Parent" while the child is in their respective physical possession, and likewise, the other respective parent shall be designated as the "Non-Custodial Parent" while not having physical possession of the minor child.
2. That both parties now reside in LaSalle County and this matter has been transferred to LaSalle County as the court of proper jurisdiction for hearings.
3. That since entry of the Joint Parenting Order, there has been substantial changes in the circumstances of the parties so that it is now necessary to

grant the Petitioner sole custody of the minor child, which in this case includes but is not limited to:

a. Respondent frequently denies Petitioner reasonable visitation of the minor child and is attempting to alienate the minor child from the Petitioner.

b. That Respondent has filed numerous unfounded police reports alleging abuse by the Petitioner toward the minor child.

c. That Respondent filed two Orders of Protection against the Respondent both of which have been denied as being without sufficient grounds.

d. Respondent's actions are designed to prevent Petitioner from establishing a stable and loving relationship with the minor child and to alienate the minor from the Petitioner.

e. The Respondent's above actions constitute severe endangerment to the minor child's mental, emotional and physical well being.

WHEREFORE, Petitioner prays that the Joint Parenting Order previously entered by the Court of Bureau County be modified to grant the Petitioner the sole care, custody and control of the minor child, and for such other and further relief as may be appropriate.

KEVIN R. KRAMER
Petitioner,

BY: _____
ROBERT B. STEELE
One of His Attorneys

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CERTIFICATION

Under penalties as provided by law, pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and as to such matters and undersigned certifies as aforesaid that he verily believes the same to be true.

KEVIN R. KRAMER

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